

SHUMWAY VAN

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Attorneys for Plaintiff

IMA ILIU FLORES ZELAYA, individually

and as legal guardian of LUIS JERSAIN SOLANO, JR.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

IMA ILIU FLORES ZELAYA, individually
and as legal guardian of LUIS JERSAIN
SOLANO, JR.; ELIA DELCARMEN
SOLANO-PATRICIO, individually and as
Administrator of the Estate of Luis Solano,

Plaintiff,

vs.

LAS VEAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; SHERIFF BILL GILLESPIE,
individually and in his capacity as Sheriff of
the Las Vegas Metropolitan Police
Department; SGT. DAVID ASPIAZU,
individually and in his capacity;
CORRECTIONS OFFICER BRADLEY
TEMPLE, individually and in his capacity;
CORRECTIONS OFFICER PATRICK
GRAY, individually and in his capacity;
CORRECTIONS OFFICER EUGENE
DIXON, individually and in his capacity;
NAPHCARE, INC., an Alabama corporation;
DOES OFFICERS I through X, individually,
and in their official capacity; DOSE XI
through XX and ROE CORPORATIONS XXI
through XXX, inclusive,

Defendants.

Case No.: 2:13-cv-01181-JAD-CWH

**STIPULATION AND ORDER TO
CONTINUE HEARING**

Hearing Date: March 20, 2017

Hearing Time: 1:30 p.m.

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STIPULATION AND ORDER TO CONTINUE HEARING

Plaintiff, IMA ILIU FLORES ZELAYA ("Mrs. Flores-Zelaya"), through her attorneys of record, Adam Anderson, Esq., with Clear Counsel Law Group, and her former attorneys, Michael C. Van, Esq., of SHUMWAY VAN, hereby stipulate and agree to the following:

WHEREAS, Plaintiff Mrs. Flores-Zelaya, changed attorneys, which started their involvement in September 13, 2016;

WHEREAS, Plaintiff's former counsel Shumway Van has agreed to continue representation for the limited purpose of obtaining an order from a Nevada State District Court allowing for the establishment of a blocked account to deposit the settlement proceeds due to Luis Jersain Solano, Jr.;

WHEREAS, Plaintiff's former counsel appeared before Judge Jim Crockett in Department 24 of the Clark County Eighth District Court on January 10, 2017 (*case no. A-16-731184-M*), to establish the blocked account;

WHEREAS, Judge Crockett informed Plaintiff's former counsel that he could not sign an order establishing the blocked account as requested by Plaintiff because the terms of the proposed order would contradict an order issued by Judge Timothy C. Williams of Department 16 of the Clark County Eighth District Court on February 18, 2016 (*case no. A-16-731892-M*), related to other minors who had received settlement awards in this matter;

WHEREAS, Plaintiff's former counsel has been working with the attorney who appeared before Judge Williams, and has had to rely on that attorney to file an amended order with Judge Williams so that Plaintiff's former counsel may then obtain an amended order from Judge Crockett;

WHEREAS, the attorney who appeared before Judge Williams sent an amended order to Judge Williams, but has not yet received the signed amended order back from the court;

WHEREAS, Plaintiff will need a copy of the signed amended order from Judge William's to produce to Judge Crockett in order to submit and obtain an amended order from Judge Crockett that will allow Plaintiff to establish a blocked account pursuant to this Court's

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Order;

WHEREAS, Plaintiff has yet to receive the amended order and, therefore, has not been able to establish a blocked account that would comply with this Court's order;

WHEREAS, Plaintiff requires more time to receive the necessary orders so that she may establish the necessary blocked account;

NOW THEREFORE, it is hereby Stipulated and Agreed by the parties to continue the hearing scheduled for March 20, 2017, at 1:30 p.m. in the above-entitled cause for a period of not less than thirty (30) days as of the date of the Order granting this Stipulation.

DATED THIS 15 day of March, 2017.

DATED THIS 15 day of March, 2017.

/s/ Michael C. Van

Michael C. Van, Esq., Bar # 3876
Daniel M. Hansen, Esq., Bar # 13886
SHUMWAY VAN
8985 S. Eastern Avenue, Suite 100
Las Vegas, Nevada 89123

*Former Attorneys for Plaintiff
IMA ILIU FLORES ZELAYA, individually
and as legal guardian of LUIS JERSAIN
SOLANO, JR.*

/s/ Adam C. Anderson

Adam C. Anderson, Esq.
CLEAR COUNSEL LAW GROUP
50 S. Stephanie St., Ste. 101
Henderson, Nevada 89012

*Attorney for Plaintiff
IMA ILIU FLORES ZELAYA, individually and
as legal guardian of LUIS JERSAIN
SOLANO, JR.*

ORDER

Based on the foregoing Stipulation and for good cause the Court makes the following Orders:

IT IS HEREBY ORDERED that the hearing previously set for March 20, 2017, be continued to April 24, 2017 at 1:30 p.m.

IT IS FURTHER ORDERED that all parties, including Plaintiff Flores Zelaya and former attorney Michael Van, MUST BE PRESENT.

DATED: 3/16/2017


UNITED STATES DISTRICT COURT JUDGE

Respectfully Submitted by:

SHUMWAY · VAN

/s/ Michael C. Van

Michael C. Van, Esq., Bar # 3876

Daniel M. Hansen, Esq., Bar # 13886

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Las Vegas, Nevada 89123

*Former Attorneys for Plaintiff, IMA ILIU FLORES ZELAYA,
individually and as legal guardian of
LUIS JERSAIN SOLANO, JR.*

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